

1 HAYNES AND BOONE, LLP
Mary-Christine Sungaila (Bar No.156795)
2 mc.sungaila@haynesboone.com
Martin M. Ellison (Bar No. 292060)
3 martin.ellison@haynesboone.com
600 Anton Blvd., Suite 700
4 Costa Mesa, CA 92626
Telephone: (949) 202-3000
5 Facsimile: (949) 202-3100

6 R. Thaddeus Behrens (Bar No. 196322)
thad.behrens@haynesboone.com
7 2323 Victory Ave., Suite 700
Dallas, TX 75219
8 Telephone: 214-651-5000
Facsimile: 214-200-0886
9

10 Sarah Jacobson
(Admitted *Pro Hac Vice*)
sarah.jacobson@haynesboone.com
11 30 Rockefeller Plaza, 26th Floor
New York, NY 10112
12 Telephone: 212-918-8967
Facsimile: 212-884-8214
13

14 Attorneys for Defendants
Molina Healthcare of California;
Molina Healthcare of California Partner Plan, Inc.; and
15 Molina Healthcare, Inc.

16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ERIC B. FROMER CHIROPRACTIC,
19 INC., a California Corporation,
individually and as the representative
20 of a class of similarly-situated persons,
Plaintiff,

21 v.
22 MOLINA HEALTHCARE OF
CALIFORNIA; MOLINA
HEALTHCARE OF CALIFORNIA
23 PARTNER PLAN, INC.; and
MOLINA HEALTHCARE, INC.; and
24 JOHN DOES 1-10,
Defendants

Case No. 2:15-cv-06403-AB-JC

Assigned To: Hon. Andre Birotte, Jr.

**JOINT STIPULATION OF
DISMISSAL WITH PREJUDICE
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 41(a)(1)(A)(ii)**

Complaint Served: Sept. 1, 2015

1 Pursuant to Fed. R. Civ. Proc. 41(a)(1)(A)(ii), Plaintiff, ERIC B. FROMER
2 CHIROPRACTIC, INC., and Defendants, Molina Healthcare of California, Molina
3 Healthcare of California Partner Plan, Inc., and Molina Healthcare, Inc., through
4 their undersigned attorneys, hereby stipulate to the dismissal of this action with
5 prejudice, class allegations without prejudice. Each party to bear its own costs.

6
7
8 DATED: October 20, 2016

GERAGOS AND GERAGOS APC

9 By: /s/ Mark John Geragos
10 Mark John Geragos (SBN 108325)
11 Benjamin Jared Meiselas (SBN 277412)
12 *Counsel for Plaintiff*

13 DATED: October 20, 2016

ANDERSON AND WANCA

14 By: /s/ Brian J. Wanca
15 Brian J. Wanca (pro hac vice)
16 Ryan M. Kelly (pro hac vice)
17 *Counsel for Plaintiff*

18 DATED: October 20, 2016

HAYNES AND BOONE, LLP

19 By: /s/ Mary-Christine Sungaila
20 Mary-Christine Sungaila (SBN 156795)
21 R. Thaddeus Behrens (SBN 196322)
22 Martin M. Ellison (SBN 292060)
23 Sarah Jacobson (SBN 4705646)
24 *Counsel for Defendants*
25
26
27
28

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 600 Anton Boulevard, Suite 700, Costa Mesa, California 92626.

I hereby certify that on October 20, 2016, I electronically filed the foregoing documents described as: **JOINT STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii)** with the Clerk of Court using the CM/ECF System, which will send notice of such filing to the following registered CM/ECF users:

Benjamin Jared Meiselas
Mark John Geragos
Geragos and Geragos APC
Historic Engine Co No 28
644 South Figueroa Street
Los Angeles, CA 90017-3411
213-625-3900
Fax: 213-232-3255
Email: meiselas@geragos.com; mark@geragos.com

Brian J Wanca
Ryan M Kelly
Anderson and Wanca
3701 Algonquin Road Suite 760
Rolling Meadows, IL 60008
847-368-1500
Fax: 847-368-1501
Email: bwanca@andersonwanca.com; rkelly@andersonwanca.com

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Executed on October 20, 2016, at Costa Mesa, California.

/s/ Breean Cordova
Breean Cordova